#### Message

From: Gerhard, Sasha [Gerhard.Sasha@epa.gov]

**Sent**: 6/17/2016 1:50:56 PM

To: Crosby-Vega, Terri [Crosby-Vega.Terri@epa.gov]

Subject: RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

Thanks, I thought it was their air rules (seeing that it's a Title V renewal;-), but wanted to be sure. I think the email is good – the state definitely should be getting a copy of the report; like you said, it is needed for the record since any decisions to allow the exceptions need a basis.

Sasha Gerhard

USEPA, Office of Resource Conservation & Recovery Program Implementation & Information Division, 5303P 703-347-8964 (P) 703-308-0509 (F)

From: Crosby-Vega, Terri

Sent: Friday, June 17, 2016 8:45 AM

To: Gerhard, Sasha < Gerhard. Sasha@epa.gov>

Subject: RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

They are under the Air Rules.

How was the email? I tried to be nice but have justification that the report is required and should be part of their record when issuing the permit.

# Terri Crosby-Vega Environmental Engineer

USEPA Region 4
Atlanta Federal Center 9T25
61 Forsyth Street SW
Atlanta, GA 30303
404-562-8497

From: Gerhard, Sasha

Sent: Thursday, June 16, 2016 4:46 PM

To: Crosby-Vega, Terri < Crosby-Vega. Terri@epa.gov >

Subject: RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

Oh, I like TDEC's rules! Are these under their air rules or RCRA?

Sasha Gerhard

USEPA, Office of Resource Conservation & Recovery Program Implementation & Information Division, 5303P 703-347-8964 (P) 703-308-0509 (F)

From: Crosby-Vega, Terri

Sent: Thursday, June 16, 2016 2:58 PM

To: Moe Baghernejad < Moe. Baghernejad@tn.gov >; Land, Eva < Land. Eva@epa.gov >

**Cc:** Lippert, Kris < <u>Lippert.Kristin@epa.gov</u>>; Feely, Ken < <u>Feely.Ken@epa.gov</u>>; Gerhard, Sasha

<<u>Gerhard.Sasha@epa.gov</u>>; Galbraith, Michael <<u>Galbraith.Michael@epa.gov</u>>; Shuster, Kenneth

<<u>Shuster.Kenneth@epa.gov</u>>; Gaines, Jeff <<u>Gaines.Jeff@epa.gov</u>>; Abdul-Malik, Norma <<u>Abdul-Malik.Norma@epa.gov</u>>

Subject: RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

Hi Moe,

Thank you for your information. However, I would like to challenge the statement that "it is a confidential document from the Army."

In accordance with TDEC 1200-3-4-.04(1)(h) an exception to open burning may be approved where "there is no other practical, safe, and/or lawful method of disposal. Documentation demonstrating why the general open burning regulations cannot be met must be submitted." TDEC 1200-3-4-.04(1)(k) also states that "Open burning conducted under this exception is only allowed where no other safe means of disposal exists." Furthermore TDEC 1200-3-4-.04 (2) states "The Technical Secretary reserves the right to require a person to cease or limit open burning if emissions from the fires are deemed by the Technical Secretary or his designee to jeopardize public health or welfare, create a public nuisance or safety hazard, create a potential safety hazard, or interfere with the attainment or maintenance of the air quality standards."

# Personal Phone / Ex. 6

Thank-you in assisting me with this information! Terri Crosby-Vega

Terri Crosby-Vega
Environmental Engineer
USEPA Region 4
Atlanta Federal Center 9T25
61 Forsyth Street SW
Atlanta, GA 30303
404-562-8497

From: Moe Baghernejad [mailto:Moe.Baghernejad@tn.gov]

Sent: Monday, June 13, 2016 10:49 AM

To: Crosby-Vega, Terri < Crosby-Vega. Terri@epa.gov>; Land, Eva < Land. Eva@epa.gov>

**Cc:** Lippert, Kris < <u>Lippert.Kristin@epa.gov</u>>; Feely, Ken < <u>Feely.Ken@epa.gov</u>> **Subject:** RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

I do not have it. I just spoke with Jimmy Ogle from HAAP. He said "it is confidential document from Army". He will respond to me after he talk to them.

Thanks

Moe Baghernejad



Moe Baghernejad | TDEC- Environmental Protection Specialist Division of Air Pollution Control William R. Snodgrass Tennessee Tower, 15<sup>th</sup> Floor 312 Rosa L. Parks Avenue Nashville, Tennessee 37243 615-532-0594 Moe.baghernejad@tn.gov

http://www.ta.aay/aayiaaaat/aia

http://www.tn.gov/environment/air.shtml

Tell us how we're doing. Take our TDEC customer service survey.

**From:** Crosby-Vega, Terri [mailto:Crosby-Vega.Terri@epa.gov]

**Sent:** Monday, June 13, 2016 7:10 AM **To:** Land, Eva; Moe Baghernejad **Cc:** Lippert, Kris; Feely, Ken

Subject: RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

\*\*\* This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. \*\*\*

I was wondering if you have a copy of the following document. Do you know if it was sent to EPA? I am looking for a copy of the document. Any information that you have would be helpful.

"Alternative Treatment Options for Open Burning of Explosive Waste at Holston Army Ammunition Plant, (ERDC/EL TR-12-8), March 2012."

Thanks!

Terri

Terri Crosby-Vega
Environmental Engineer
USEPA Region 4
Atlanta Federal Center 9T25
61 Forsyth Street SW

#### Atlanta, 6A 30303

#### 404-562-8497

From: Land, Eva

**Sent:** Monday, May 23, 2016 2:06 PM **To:** Feely, Ken < Feely.Ken@epa.gov>

Cc: Crosby-Vega, Terri <<a href="mailto:Crosby-Vega.Terri@epa.gov">Crosby-Vega.Terri@epa.gov</a>; Lippert, Kris <<a href="mailto:Lippert.Kristin@epa.gov">Lippert.Kristin@epa.gov</a>>

Subject: RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

Ken,

I will raise this comment. I have a few things in front of this one, but I'll send out my draft comments once I have everything all together.

Eva

From: Feely, Ken

**Sent:** Monday, May 23, 2016 9:03 AM **To:** Land, Eva < <u>Land.Eva@epa.gov</u>>

**Cc:** Crosby-Vega, Terri < Crosby-Vega.Terri@epa.gov>; Lippert, Kris < Lippert.Kristin@epa.gov>

Subject: RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

Eva.

Is it still your intent to seek the addition of a specific prohibition on the open burning of PCBs in the new permits?

Ken Feely | EPA Region 4 | Resource Conservation & Restoration Division Regional PCB Program Coordinator/Team Lead USEPA Region 4 | Atlanta Federal Center 9T25 61 Forsyth Street SW | Atlanta GA 30303-8960 O: 404.562.8512 | F: 404.562.9964 | M: 470.725.7929

feely.ken@epa.gov

From: Land, Eva

Sent: Friday, May 20, 2016 2:35 PM

To: Gala, Chetan < Gala. Chetan@epa.gov >; Russo, Todd < Russo. Todd@epa.gov >; Feely, Ken < Feely. Ken@epa.gov >;

Powell, Keri < <a href="mailto:Powell.Keri@epa.gov">Powell, Keri < <a href="mailto:Powell.Keri@epa.gov">Powell.Keri@epa.gov</a>>
<a href="mailto:Subject: Fw: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant">Powell.Keri@epa.gov</a>>
<a href="mailto:Subject: Fw: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant">Powell.Keri@epa.gov</a>>

Hello Again,

There are apparently two title V permits for this facility. The two permits are in different counties. If you have any comments please let me know by 6/17 on this one as well.

Thanks for your help.

Eva

From: Moe Baghernejad < Moe. Baghernejad@tn.gov >

Sent: Friday, May 20, 2016 2:03 PM

To: Land, Eva

Subject: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

### "Concurrent Review Requested"

Dear Ms. Land:

Enclosed for your information is a copy of the Division's draft major source (Title V) operating permit renewal, the public notice and statement of basis for:

Holston Army Ammunition Plant BAE Systems Ordnance Systems Inc. 4509 West Stone Drive Kingsport, TN 37660

This notice was placed in the legal section of the Kingsport Times-News on May 18, 2016. You are invited to review and comment. You agreed to treat this draft permit as a proposed permit and to perform your 45-day review concurrently with the Public Notice period.

If you have any questions or comments concerning this source, please contact Moe Baghernejad at (615)532-0594 or via email at moe.baghernejad@tn.gov.

## Thanks Moe Baghernejad



Moe Baghernejad | TDEC- Environmental Protection Specialist Division of Air Pollution Control William R. Snodgrass Tennessee Tower, 15<sup>th</sup> Floor 312 Rosa L. Parks Avenue Nashville, Tennessee 37243 615-532-0594 Moe.baghernejad@tn.gov http://www.tn.gov/environment/air.shtml